

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

MOSES ISHAM AND KAYCE	)	
ISHAM,	)	
	)	Case No. CIV-16-881-HE
Plaintiffs,	)	
	)	
v.	)	
	)	
3M COMPANY, doing business as	)	
CAPITAL SAFETY USA and/or DBI	)	
SALA, and/or DB INDUSTRIES,	)	
INC., a foreign corporation,	)	
	)	
Defendant.	)	
	)	

UNOPPOSED MOTION FOR PROTECTIVE ORDER

Defendants 3M COMPANY (incorrectly designated as Capital Safety USA and/or DBI SALA and/or DB INDUSTRIES) and DB Industries, LLC (“Defendants”), by and through their counsel, Murray E. Abowitz, and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, hereby request that this Court issue a Protective Order regarding certain proprietary or confidential information sought by the parties in this matter, and as grounds states:

1. Rule 26(c) states in pertinent part: “Upon motion by a party or by the person from whom discovery is sought . . . and for good cause shown, the court . . . may make any order which justice requires to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense.”

2. During the course of this action, the parties have determined it will be

necessary for 3M and DB Industries LLC to disclose non-public confidential information of a competitively or commercially sensitive, proprietary, or trade-secret nature, which may include design drawings, manufacturing specifications, testing information, financial and pricing data and other confidential commercial or proprietary information that Defendant has historically kept secret due to their competitively sensitive nature.

3. For their part, Plaintiffs are also going to produce medical records and other personal identifying information, the public disclosure of which could cause harm.

4. To protect the respective interests of the parties and to facilitate the progress of disclosure and discovery in this case, while also complying with the Federal Rules of Civil Procedure, the parties respectfully request the Court enter the “Stipulated Protective Order” attached hereto as Exhibit 1.

5. The Stipulated Protective Order identifies the types of documents and information (“Confidential Information”) covered by the terms of Stipulated Protective Order and protects the use of that during and following the conclusion of this litigation.

WHEREFORE, Plaintiff and Defendant respectfully request the Court enter the Stipulated Protective Order attached as Exhibit “1” and submitted contemporaneously with this Motion.

Dated this 25<sup>th</sup> day of October, 2016.

Respectfully submitted,

/s/ Murray E. Abowitz  
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*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25<sup>th</sup> day of October, 2016, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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/s/ Murray E. Abowitz